To the Commission
RE: RM-31052

I am a 51-year RF design engineer. I've held the highest FCC licenses over the years, including the FCC First Class Radiotelephone and Amateur Extra Class Licenses. Through the 1970's I owned and managed a broadcast, two-way and marine service business. I presently design communications, industrial, scientific and medical radio-frequency equipment and systems.

I have regularly used 160-meters since I was first licensed in the early 1960's. My operating time is equally divided between radiotelephone and Morse code operation, and I also operate newer digital modes.

I fully support RM-10352. My reasons for supporting RM-10352 follow:

Over the past 40 years, the vast majority of conflicts on 160-meters involve disputes between narrow and wide mode operators. Considerable FCC and amateur resources were involved in monitoring operators as early as the 1970's, because of a very small percentage of operators who refuse to follow voluntary bandplans or operating guidelines. In the 1970's, complaints of wide-mode interference to narrow modes reached as high as Commission Chief Prose Walker. Problems continue today, requiring FCC involvement in wide-mode interference to narrow-mode operation. As recently as a few months ago special consul Riley Hollingsworth at the FCC had to spend time with three amateurs who failed to follow the ARRL Bandplan.

While some will claim lack of a formal division between wide and narrow modes reduces the burden on FCC resources, nothing is further from the truth. Historically most 160-meter FCC resources are devoted to resolving conflicts between wide and narrow modes. These disputes arise because 160-meters is the only band below 144-MHz without a formal wide and narrow mode boundary. Amateurs by and large follow FCC rules, so virtually all cases of interference between wide and narrow modes could be resolved with a minimal effort rule change. A rule such as the proposed RM-10352 would lessen the frequency and necessity of FCC involvement, and promote better harmony between amateurs using 160-meters.

Additionally, narrow modes are the frontier of communications. Very narrow bandwidth data modes are becoming popular, and are a technical advancement to all communications. These narrow modes and other narrow experimental data modes deserve the protection afforded by a clear boundary between narrow and wide modes. The FCC wisely set such boundaries on all other bands from 80 through two meters. Time has proven that to be a good decision, little if any FCC resources are required to enforce those rules.

I urge the Commission to apply the same technical wisdom to 160-meters.

Sincerely, Charles T Rauch W8JI